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The Initial Pretrial Conference ("IPTC") scheduled for May 17, 2022 is adjourned to a date after the Court has issued a decision on Defendant's forthcoming motion to dismiss. The parties shall proceed with discovery while the decision on Defendant's motion to dismiss is pending. The deadline for the parties to submit the proposed case management plan and scheduling order for the Court's approval is adjourned from May 10, 2022 to May 17, 2022.

SO ORDERED.

Date: May 10, 2022
New York, New York

May 9, 2022

JOHN P. CRONAN
United States District Judge

VIA ECF

Honorable John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: *Caroline Bucci v. Network Recovery Services, Inc.*
Civil Action No. 1:22-cv-854 (JPC)

Dear Judge Cronan:

We represent Defendant Network Recovery Services, Inc. ("NRS") in the above matter. NRS writes to request that the Initial Pretrial Conference, which is currently scheduled for May 17, 2022, and all deadlines related thereto, be adjourned until a date after the Court has issued a decision on NRS' Motion to Dismiss the Complaint. Per the Court's April 26, 2022 Order, the Motion to Dismiss is to be filed by May 24, 2022. (Dkt. No. 16). The additional time would allow the parties to conserve resources while the Motion to Dismiss, which could result in the dismissal of the Complaint in its entirety, is pending. This is the second request for an extension of this deadline.

Plaintiff's counsel was asked if it would consent to the herein request for an adjournment. Plaintiff's counsel responded that they would not oppose NRS' application for the adjournment of the Initial Pretrial Conference until a date after the Court decides the Motion to Dismiss, but could not agree to a request to stay discovery.

Thank you for the Court's kind attention to this matter.

Respectfully,

/s/Lori A. Medley

Lori A. Medley

cc: All counsel of record via ECF